

The Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMAZON.COM, INC., *et al.*,

Defendants.

No. 2:23-cv-0932-JHC

**STIPULATION AND [PROPOSED]
ORDER REGARDING CROSS-
MOTIONS FOR PROTECTIVE
ORDER**

**NOTE ON MOTION CALENDAR:
January 24, 2024**

STIPULATED MOTION

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed Order set forth below, which permits a party resisting a motion to compel discovery to do so without any requirement that it file a separate cross-motion for a protective order.

In support of this request, the parties represent the following to the Court:

1. The parties are in ongoing negotiations regarding discovery issues.
2. The parties agree that if, despite their best efforts, judicial intervention is needed to resolve their disputes, they would like to make the process as efficient as possible for the Court and parties.
3. To further this goal, the parties agree that a party resisting a motion to compel discovery may, at the party's election, oppose the motion to compel in an opposition brief without the need to file a cross-motion for a protective order.

4. Accordingly, the parties stipulate as follows and jointly request that the Court enter the following order approving that stipulation:

- a. A cross-motion for a protective order will not be required from any party to fully resist a motion to compel without waiving any rights or privileges.
- b. Any party at its election may also affirmatively move or cross-move for a protective order pursuant to LCR 7(k) should it choose to do so.

Stipulated to and respectfully submitted this 24th day of January, 2024, by:

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Approved and Agreed To By:

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ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED this _____ day of _____, 2024.

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE

Presented By:
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